

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

EVERETT CHAD NELSON,

Defendant.

Case No. 1:24-MJ-434

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT AND ARREST WARRANT

I, T. Michael Class Jr., being duly sworn, depose and state:

1. I am currently employed as a Special Agent of the Federal Bureau of Investigation (“FBI”) and have been so employed since September 17, 2017. Since January 2022, I have been assigned to the Washington Field Office (“WFO”) of the FBI, where I investigate violations of federal law that occur within the airport environment and on-board aircrafts. I am familiar with the relevant federal statutes, including under Titles 18 and 49 of the United States Code, and have conducted numerous investigations into offenses that have occurred upon an aircraft.

2. This affidavit is submitted in support of a criminal complaint and an arrest warrant for EVERETT NELSON (“NELSON”), who, within the special aircraft and territorial jurisdiction of the United States, knowingly assaulted another person by striking, beating, or wounding, in violation of Title 18, United States Code, Section 113 (a)(4).

3. The facts set forth in this statement of probable cause are based on my personal observations, my training and experience, and information obtained from other law enforcement officers and witnesses. This affidavit contains information necessary to support probable cause

and is not intended to include each and every fact or matter observed by me or known to the United States.

SUMMARY OF FACTS TO SUPPORT PROBABLE CAUSE

4. On October 28, 2024, at approximately 12:26 p.m., the FBI was contacted by the Transportation Security Administration (TSA) regarding a Level 2 disturbance aboard United Airlines Flight # 2247 flying nonstop from San Francisco (SFO) to Dulles International Airport (IAD).

5. At approximately two hours into the flight, NELSON left his assigned seat 35F from the rear of the aircraft and proceeded to the lavatory at the front of the aircraft.

6. NELSON exited the lavatory, stopped at seat 12F, and without notice began physically attacking a sleeping male passenger (hereinafter V-1) by punching him repeatedly in the face and head until blood was drawn. V-1 sustained bruising on his eyes and a gash on his nose. Blood splatter from V-1's face and head were observed on the sleeves of NELSON's lime green windbreaker coat.

7. The assault on V-1 lasted approximately one minute. V-1 began screaming, and another passenger intervened and pulled the defendant off of V-1.

8. After the physical altercation occurred, NELSON was moved to a seat near the front of the aircraft and monitored by the passenger who stopped the assault. No other incident occurred on the flight. V-1 was treated by a doctor aboard the flight for abrasions to the face and head.

9. Multiple passengers witnessed NELSON assault V-1. Witnesses observed blood on the seat near V-1 and on the wall and window. NELSON had no observable injuries and there was no indication that V-1 struck him in defense.

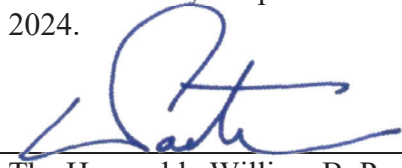
CONCLUSION

10. Based upon the foregoing, I submit there is probable cause to believe that on or about October 28, 2024, in the Eastern District of Virginia, the defendant, NELSON, on an aircraft in the special aircraft jurisdiction of the United States, namely United Airline Flight 2247 flying from San Francisco (SFO) to Dulles International Airport (IAD), did commit assault by beating, striking, and wounding, in violation of Title 18 United States Code, Section 113(a)(4).

Respectfully submitted,

T. Michael Class Jr.
Special Agent
Federal Bureau of Investigations

Respectfully submitted and attested to in
accordance with the requirements of Fed. R.
Crim. P. 4.1 by telephone on October 29,
2024.

A handwritten signature in blue ink, appearing to read 'W. Porter', is written over a horizontal line.

The Honorable William B. Porter
United States Magistrate Judge
Alexandria, Virginia